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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROWAN M. OLSEN,

Defendant.

Case No. 3:20-cr-00204-JO

UNOPPOSED MOTION TO
CONTINUE TRIAL DATE

The defendant, Rowan Olsen, through counsel, Susan Russell, respectfully moves the Court to enter an order continuing the jury trial date in the above-captioned case for at least 90 days (i.e., until December 14, 2021). Trial is currently scheduled for September 14, 2021. This constitutes Mr. Olsen's fifth request to continue his trial date. The government, through Assistant U.S. Attorney Ashley Cadotte, has no opposition to this motion.

A continuance of the current trial date for at least 90 days is necessary to provide the defense with additional necessary time to prepare for trial as well as engage in

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renewed plea negotiations with the government once all independent investigation is completed. New discovery was provided by the government only today and has not yet been reviewed by the defense. Additionally, further time is needed to consult with a recently retained defense expert about critical issues in this case. Finally, the defense requires more time to complete research into possible defenses, to research and file appropriate legal motions, and to otherwise prepare for trial.

Mr. Olsen is out of custody and in full compliance with all pretrial release conditions. Since June 2021, he has been employed by GPS Enterprises as a full-time Type II Wild Land Firefighter. At present, Mr. Olsen is actively engaged in fighting his fourth wildfire so far this summer. Mr. Olsen will continue to work full time as a wildland firefighter through the fire season, until end of October, though possibly longer.

Defense counsel has spoken with Mr. Olsen, explained the bases for requesting a continuance, and the rights that he has under the Speedy Trial Act (18 U.S.C. § 3161(h)(7)(A)). Mr. Olsen knowingly and voluntarily waives his rights under the Speedy Trial Act. He respectfully requests that the Court continue his trial date for at least 90 days.

RESPECTFULLY submitted this 12th day of August, 2021.

/s/ Susan A. Russell
Susan A. Russell
Assistant Federal Public Defender